

April 17, 2024

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
By: CR  
Deputy

**DR:24-CR-00879-AM**

**INDICTMENT**

## FORFEITURE

THE GRAND JURY CHARGES:

COUNT ONE

[8 U.S.C. § 1324(a)(1)(A)(v)(I) & (B)(i)/(B)(iv)]

On or about May 25, 2021, through on or about March 8, 2024, in the Western District of Texas, and elsewhere, Defendants,

ROLAND HEITH MARTINEZ A/K/A "HOUSTON77013," A/K/A "FEDBLOC654," A/K/A "DONALD", A/K/A "RO"

together, and with others known and unknown, did knowingly and intentionally, conspire, combine, and confederate to commit the following acts against the United States: transport and move and attempt to transport and move aliens within the United States by means of transportation and otherwise, while knowing and in reckless disregard of the fact that the aliens had come to, entered, and remained in the United States, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii), and in furtherance of such violation of law, and such offense resulted in the death of one or more persons, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) and (B)(iv).

COUNT TWO

[8 U.S.C. § 1324(a)(1)(A)(ii) & (B)(iv)]

On or about August 7, 2022, in the Western District of Texas, Defendants,

ROLAND HEITH MARTINEZ A/K/A "HOUSTON77013," A/K/A "FEDBLOC654," A/K/A "DONALD", A/K/A "RO"

knowing and in reckless disregard of the fact that a certain alien, namely, Ms. S.H-R., had come to, entered and remained in the United States in violation of law, did willfully and unlawfully transport and move, and attempt to transport and move, said alien within the United States by means of transportation and otherwise, and in furtherance of such violation of law, and said offense resulted in the death of one and more than one persons, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(iv).

COUNT THREE

[8 U.S.C. § 1324(a)(1)(A)(ii) & (B)(i)]

On or about October 10, 2021, in the Western District of Texas, Defendant,

ROLAND HEITH MARTINEZ A/K/A “HOUSTON77013,” A/K/A “FEDBLOC654,” A/K/A  
“DONALD”, A/K/A “RO”

knowing and in reckless disregard of the fact that a certain alien, namely, Angel Eduardo Pecina-Esquivel, had come to, entered and remained in the United States in violation of law, did willfully and unlawfully transport and move, and attempt to transport and move, said alien within the United States by means of transportation and otherwise, and in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(i).

COUNT FOUR

[8 U.S.C. § 1324(a)(1)(A)(ii) & (B)(i)]

On or about October 31, 2021, in the Western District of Texas, Defendant,

ROLAND HEITH MARTINEZ A/K/A “HOUSTON77013,” A/K/A “FEDBLOC654,” A/K/A  
“DONALD”, A/K/A “RO”,

knowing and in reckless disregard of the fact that a certain alien, namely, Junior Josue Ramos-Balladares, had come to, entered and remained in the United States in violation of law, did willfully and unlawfully transport and move, and attempt to transport and move, said alien within the United States by means of transportation and otherwise, and in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(i).

COUNT FIVE

[8 U.S.C. § 1324(a)(1)(A)(ii) & (B)(i)]

On or about September 28, 2022, in the Western District of Texas, Defendant,

ROLAND HEITH MARTINEZ A/K/A “HOUSTON77013,” A/K/A “FEDBLOC654,” A/K/A  
“DONALD”, A/K/A “RO”,

knowing and in reckless disregard of the fact that a certain alien, namely, Belvin Romario Fajardo-Garcia, had come to, entered and remained in the United States in violation of law, did willfully and unlawfully transport and move, and attempt to transport and move, said alien within the United States by means of transportation and otherwise, and in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(i).

COUNT SIX

[8 U.S.C. § 1324(a)(1)(A)(ii) & (B)(i)]

On or about May 9, 2023, in the Western District of Texas, Defendant,

■ [REDACTED]

knowing and in reckless disregard of the fact that a certain alien, namely, Brenda Elizabeth Gonzalez-Rosales, had come to, entered and remained in the United States in violation of law, did willfully and unlawfully transport and move, and attempt to transport and move, said alien within the United States by means of transportation and otherwise, and in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(i).

COUNT SEVEN

[8 U.S.C. § 1324(a)(1)(A)(ii) & (B)(i)]

On or about September 2, 2023, in the Western District of Texas, Defendant,

[REDACTED]

knowing and in reckless disregard of the fact that a certain alien, namely, Bryan Alexander Banegas-Castillo, had come to, entered and remained in the United States in violation of law, did willfully and unlawfully transport and move, and attempt to transport and move, said alien within the United States by means of transportation and otherwise, and in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(i).

COUNT EIGHT

[8 U.S.C. § 1324(a)(1)(A)(ii) & (B)(i)]

On or about September 4, 2023, in the Western District of Texas, Defendant,

[REDACTED]

knowing and in reckless disregard of the fact that a certain alien, namely, Jerzon Eliu Alvarado-Villeda, had come to, entered and remained in the United States in violation of law, did willfully and unlawfully transport and move, and attempt to transport and move, said alien within the United States by means of transportation and otherwise, and in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(i).

**NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE**  
**[See FED. R. CRIM. P. 32.2]**

**I.**

**Immigration Violations and Forfeiture Statute**  
**[Title 8 U.S.C. § 1324(a)(1)(A)(v)(I)/(ii),**  
**subject to forfeiture pursuant to Title 18 U.S.C. § 982(a)(6)(A)]**

As a result of the criminal violations set forth in Counts One through Eight, the United States of America gives notice to the Defendants of its intent to seek the forfeiture of the property, including any items listed below, upon conviction and as a part of sentence pursuant to FED. R. CRIM. P. 32.2 and Title 18 U.S.C. § 982(a)(6)(A) which states:

**Title 18 U.S.C. § 982. Criminal Forfeiture**

**(a)(6)(A)** The court, in imposing sentence on a person convicted of a violation of, or conspiracy to violate, section 274(a) ... of the Immigration and Nationality Act ... shall order that the person forfeit to the United States, regardless of any provisions of State law—

- (i)** any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense of which the person is convicted; and
- (ii)** any property real or personal—
  - (I)** that constitutes or derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense for which the person is convicted; or
  - (II)** that is used to facilitate, or is intended to be used to facilitate, the commission of the offense of which the person is convicted.

**II.**

**Money Judgment**

**Money Judgment:** A sum of money equal to the value of the proceeds from the immigration violations for which each Defendant is solely liable.

**IV.  
Substitute Property**

If any proceeds from the immigration violations and property involved in the money laundering violations, as a result of any act or omission of the Defendants—

- (A) cannot be located upon the exercise of due diligence;
- (B) has been transferred or sold to, or deposited with, a third party;
- (C) has been placed beyond the jurisdiction of the court;
- (D) has been substantially diminished in value; or
- (E) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek the forfeiture of any other property of each Defendant, up to the value of each money judgment, as substitute property pursuant to Title 21 U.S.C. § 853(p) and FED. R. CRIM. P. 32.2(e).

A TRUE BILL

FOREPERSON

JAIME ESPARZA  
United States Attorney

By: *Brett C. Miner*

BRETT C. MINER  
Assistant United States Attorney